

217/782-2113

"RENEWAL"  
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE:

Meyer Steel Drum, Inc.  
Attn: Denise Jones, Administrative Assistant  
3201 South Millard Avenue  
Chicago, Illinois 60623

I.D. No.: 031600APY

Date Received: May 7, 2004

Application No.: 95120079

Date Issued: July 20, 2005

Expiration Date<sup>1</sup>: July 19, 2010

Operation of: Drum Reconditioning Facility

Source Location: 3201 South Millard Avenue, Cook County, 60623

Responsible Official: Edward Meyer, Secretary/Treasurer

This permit is hereby granted to the above-designated Permittee to OPERATE a steel drum reconditioning plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 1  
CES  
Lotus Notes

<sup>1</sup> This permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. The authority for these provisions is found in these regulations and in the general authority provided to the Illinois EPA by Section 9.1 of the Environmental Protection Act (Act) and Sections 39(a) and 39.5(7)(a) of the Act, which authorize the Illinois EPA to include conditions in permits that are required to accomplish the purposes of the Act. Any such terms and conditions are specifically identified within this permit as T1 conditions. These terms and conditions continue in effect as provided by Condition 8.7 of this permit, notwithstanding the expiration date specified above, as their authority derives from Title I, as well as from Title V of the CAA.

## TABLE OF CONTENTS

|   | <u>Page</u> |
|---|-------------|
| 1.0 <u>SOURCE IDENTIFICATION</u>  | 4           |
| 1.1    Source   |             |
| 1.2    Owner/Parent Company   |             |
| 1.3    Operator   |             |
| 1.4    General Source Description                                       |             |
| 2.0 <u>LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED</u>             | 5           |
| 3.0 <u>CONDITIONS FOR INSIGNIFICANT ACTIVITIES</u>                      | 6           |
| 3.1    Identification of Insignificant Activities                       |             |
| 3.2    Compliance with Applicable Requirements                          |             |
| 3.3    Addition of Insignificant Activities                             |             |
| 4.0 <u>SIGNIFICANT EMISSION UNITS AT THIS SOURCE</u>                    | 9           |
| 5.0 <u>OVERALL SOURCE CONDITIONS</u>                                    | 10          |
| 5.1    General Source Description                                       |             |
| 5.2    Major Source Status  |             |
| 5.3    General Applicable Provisions and Regulations                    |             |
| 5.4    General Non-Applicability of Regulations of Concern              |             |
| 5.5    General Source-Wide Control Requirements and Work Practices      |             |
| 5.6    General Source-Wide Production and Emission Limitations          |             |
| 5.7    General Testing Requirements                                     |             |
| 5.8    General Monitoring Requirements                                  |             |
| 5.9    General Recordkeeping Requirements                               |             |
| 5.10    General Reporting Requirements                                  |             |
| 5.11    General Operational Flexibility/Anticipated Operating Scenarios |             |
| 5.12    General Compliance Procedures                                   |             |
| 6.0 <u>CONDITIONS FOR EMISSIONS CONTROL PROGRAMS</u>                    | 18          |
| 6.1    Emissions Reduction Market System (ERMS)                         |             |
| 7.0 <u>UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS</u>         | 24          |
| 7.1    Coating Lines  |             |
| 7.2    Drum Reclamation Furnace   |             |
| 7.3    Shot Blasters  |             |
| 7.4    Natural Gas-Fired Boiler   |             |
| 7.5    Plastic Drum Shredder  |             |

|      |   |                   |
|------|---|-------------------|
| 8.0  | <u>GENERAL PERMIT CONDITIONS</u>                        | <u>Page</u><br>45 |
| 8.1  | Permit Shield   |                   |
| 8.2  | Applicability of Title IV Requirements                  |                   |
| 8.3  | Emissions Trading Programs                              |                   |
| 8.4  | Operational Flexibility/Anticipated Operating Scenarios |                   |
| 8.5  | Testing Procedures                                      |                   |
| 8.6  | Reporting Requirements                                  |                   |
| 8.7  | Obligation to Comply with Title I Requirements          |                   |
| 9.0  | <u>STANDARD PERMIT CONDITIONS</u>                       | 50                |
| 9.1  | Effect of Permit  |                   |
| 9.2  | General Obligations of Permittee                        |                   |
| 9.3  | Obligation to Allow Illinois EPA Surveillance           |                   |
| 9.4  | Obligation to Comply with Other Requirements            |                   |
| 9.5  | Liability   |                   |
| 9.6  | Recordkeeping   |                   |
| 9.7  | Annual Emissions Report                                 |                   |
| 9.8  | Requirements for Compliance Certification               |                   |
| 9.9  | Certification   |                   |
| 9.10 | Defense to Enforcement Actions                          |                   |
| 9.11 | Permanent Shutdown                                      |                   |
| 9.12 | Reopening and Reissuing Permit for Cause                |                   |
| 9.13 | Severability Clause                                     |                   |
| 9.14 | Permit Expiration and Renewal                           |                   |
| 10.0 | <u>ATTACHMENTS</u>                                      |                   |
| 1    | Example Certification by a Responsible Official         | 1-1               |
| 2    | Allowable Emissions of Particulate Matter               | 2-1               |
| 3    | Compliance Assurance Monitoring (CAM) Plan              | 3-1               |
| 4    | Guidance  | 4-1               |

**1.0 SOURCE IDENTIFICATION**

1.1 Source

Meyer Steel Drum, Inc,  
3201 South Millard Avenue  
Chicago, Illinois 60623  
773/376-8376

I.D. No.: 031600APY

County: Cook

Standard Industrial Classification: 3412, Steel Drum Manufacturing and  
Coating

1.2 Owner/Parent Company

Meyer Steel Drum, Inc,  
3201 South Millard Avenue  
Chicago, Illinois 60623

1.3 Operator

Meyer Steel Drum, Inc,  
3201 South Millard Avenue  
Chicago, Illinois 60623

Denise Jones, Administrative Assistant  
773/376-8376

## 2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

|                  |  |
|------------------|--|
| ACMA             | Alternative Compliance Market Account  |
| Act              | Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]   |
| AP-42            | Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711 |
| ATU              | Allotment Trading Unit   |
| BAT              | Best Available Technology  |
| CAA              | Clean Air Act [42 U.S.C. Section 7401 et seq.]   |
| CAAPP            | Clean Air Act Permit Program   |
| CAM              | Compliance Assurance Monitoring  |
| CEMS             | Continuous Emission Monitoring System  |
| CFR              | Code of Federal Regulations  |
| ERMS             | Emissions Reduction Market System  |
| HAP              | Hazardous Air Pollutant  |
| IAC              | Illinois Administrative Code   |
| I.D. No.         | Identification Number of Source, assigned by Illinois EPA  |
| ILCS             | Illinois Compiled Statutes   |
| Illinois EPA     | Illinois Environmental Protection Agency   |
| LAER             | Lowest Achievable Emission Rate  |
| MACT             | Maximum Achievable Control Technology  |
| NESHAP           | National Emission Standards for Hazardous Air Pollutants   |
| NO <sub>x</sub>  | Nitrogen Oxides  |
| NSPS             | New Source Performance Standards   |
| PM               | Particulate Matter   |
| PM <sub>10</sub> | Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods  |
| PSD              | Prevention of Significant Deterioration  |
| RMP              | Risk Management Plan   |
| SO <sub>2</sub>  | Sulfur Dioxide   |
| T1               | Title I - identifies Title I conditions that have been carried over from an existing permit  |
| T1N              | Title I New - identifies Title I conditions that are being established in this permit  |
| T1R              | Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit  |
| USEPA            | United States Environmental Protection Agency  |
| VOM              | Volatile Organic Material  |

### 3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

- Oil Storage Tanks #2, #7 and #8
- Wash/Dip Tank
- Drum Preheater
- Drum Interior Washers
- Drum Exterior Washer
- Rinse Tanks
- Cleaning Tank
- Rust Inhibitor Tank

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

- Flame Treat Unit
- Dent Removers
- Chime Straighteners
- Ring Straightener
- Lid Straightener
- Testing Area
- Horizontal and Vertical Drum Coolers
- Vacuum Emptying
- Rinse Tank
- Oil Tank
- Process Tanks for Caustic Detergent Recycling
- Tight Head Assembly Equipment
- Leak Testers
- Food Drum Washer
- Vacuum System
- Purge Unit
- Semi Auto Leak Tester

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

- Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat

input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182.
- 3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, a vapor recovery system, or an equivalent device approved by the Illinois EPA. [Note: storage tanks used for storing gasoline and any hazardous air pollutants are not illegible for insignificant activities].

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).



#### 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

| Emission Unit                           | Description   | Date of Construction                     | Emission Control Equipment                |
|---|---|--|---|
| Unit 01<br><br>Coating Lines            | <u>Coating Line #1</u> (Interior Coating Line with Spray Booth SPB-1 and Steam Flash Oven FO-1) | April-August 1991 (All Lines)            | Filter (AF-1)                             |
|   | <u>Coating Line #2</u> (Primer Coating Line with Coating Booth SPB-2 and Curing Oven CO-1)      |  | Filter (AF-2)                             |
|   | <u>Coating Line #3</u> (Exterior Coating Line with Coating Booth SPB-3 and Curing Oven CO-2)    |  | Filter (AF-3)                             |
|   | <u>Coating Line #4</u> (Interior Coating Line with Spray Booth SPB-4 and Steam Flash Oven CO-1) |  | Water Wall (WW-1)                         |
|   | <u>Coating Line #5</u> (Exterior Coating Line with Coating Booth SPB-5 and Curing Oven CO-2)    |  | Water Wall (WW-2)                         |
|   | <u>Coating Line #6</u> (Exterior Coating Line with Coating Booth SPB-6 and Curing Oven CO-3)    |  | Filter (AF-4)                             |
|   | <u>Coating Line #7</u> (Ring Dip Coating Line with Dip Coater DC-1 and Curing Oven CO-2)        |  | None                                      |
| Unit 02<br><br>Drum Reclamation Furnace | Natural Gas-Fired Drum Cleaning Reclamation Furnace DRF-1                                       | 1991 (Modified - 2003, PTE Construction) | Permanent Total Enclosure and Afterburner |
| Unit 03<br><br>Shot Blasters            | Shot Blasters 1-4 (SB-1 Through SB-4) for Removing Scales                                       | 1991 (#1-#3)<br>1993 (#4)                | Fabric Filter for Each Shot Blaster       |
| Unit 04<br><br>Natural Gas-Fired Boiler | Maximum Heat Input Capacity:<br>12 mmBtu/hr   | 1991                                     | None                                      |
| Unit 05<br><br>Plastic Drum Shredder    | Shredding Plastic Drums   | 1996                                     | Cyclone Separator Followed by a Baghouse  |

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 General Source Description

- 5.1.1 Meyer Steel Drum, Inc. is located at 3201 South Millard Avenue in Chicago and reconditions and recycles industrial shipping containers. Coatings are used to provide a durable, protective finish that resist weathering, abrasion, impacts, and in the case of interior linings, provide chemical resistance to the contents of the container. Drums are cleaned to remove residue either in drum furnaces or by caustic wash. The method chosen depends on the residue material and type of drum. Drums are then shot blasted to complete the cleaning process and finally coated.
- 5.1.2 This source is located in an area that is non-attainment for ozone and attainment for other pollutants of the National Ambient Air Quality Standards.

### 5.2 Major Source Status

- 5.2.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

### 5.3 General Applicable Provisions and Regulations

- 5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.
- 5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:
  - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
  - b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
  - c. Pursuant to 35 IAC 237.102, no person shall cause or allow open burning, except the Illinois EPA may grant permits for open burning in accordance with 35 IAC 237.201.

#### 5.3.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.5 Future Emission Standards

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new regulations (see Condition 9.12.2).
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable regulations under 40 CFR Parts 60, 61, 62,

or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

- c. i. This stationary source should comply with 40 CFR Part 63, Subpart M National Emission Standards for Hazardous Air Pollutants "Surface Coating of Miscellaneous Metal Parts and Products" when a compliance date January 2, 2007 become affective.
- ii. The source may use either or all of the following to comply with emission standards established in 40 CFR 63.3890:
  - A. For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.
  - B. For each existing high performance coating affected source, limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.
  - C. For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 1.5 kg (12.4 lbs) organic HAP per liter (gal) coating solids used during each 12-month compliance period.
  - D. If the source's surface coating operations meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.3890(b), the source may comply separately with each subcategory emission limit or comply using one of the alternatives in paragraph 63.3890(c) (1) or (2).
- iii. Pursuant to 63.3891(c), if the source decides to use an add-on control option, then the demonstration shall be provided that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. If the source uses this compliance option, the source must also demonstrate that all emission capture systems and add-on control devices for the coating operation(s)

meet the operating limits required in 63.3892, except for solvent recovery systems for which you conduct liquid-liquid material balances according to 63.3961(j), and that the source meets the work practice standards required in 63.3893. The source must meet all the requirements of 63.3960 through 63.3968 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option.

Construction permit for any proposed add-on control operations shall be properly obtained from the Illinois EPA, if an add-on control option is utilized.

#### 5.3.6 Episode Action Plan

- a. Pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.
- d. A copy of the original plan and any subsequent revisions shall also be sent to the Chicago Department of Environmental Control.

#### 5.4 General Non-Applicability of Regulations of Concern

General non-applicability of regulations of concern are not set for this source. However, there may be unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

#### 5.5 General Source-Wide Control Requirements and Work Practices

General source-wide control requirements and work practices are not set for this source. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

## 5.6 General Source-Wide Production and Emission Limitations

### 5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

#### Permitted Emissions of Regulated Pollutants

| Pollutant                          | Tons/Year |
|------------------------------------|-----------|
| Volatile Organic Material (VOM)    | 123.86    |
| Sulfur Dioxide (SO <sub>2</sub> )  | 0.03      |
| Particulate Matter (PM)            | 22.41     |
| Nitrogen Oxides (NO <sub>x</sub> ) | 9.87      |
| HAP, not included in VOM or PM     | ----      |
| Total                              | 156.17    |

### 5.6.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

### 5.6.3 Other Source-Wide Emission Limitations

The VOM emissions from the source-wide coating operation, i.e., spray booths SPB-1 through SPB-6 and dip coater DC-1 shall not exceed the following limits:

| Pollutant | Emissions<br>(Tons/Year) | Underlying Rules |
|-----------|--------------------------|------------------|
| VOM       | 97.7                     | 35 IAC Part 203  |

The above limitations were established in a Federally Enforceable State Operating Permit 90060034, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined based on the recordkeeping requirements established in Section 7 of this permit and from a running total of 12 months of data.

## 5.7 General Testing Requirements

Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a.     Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b.     Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c.     Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

## 5.8 General Monitoring Requirements

General monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

## 5.9 General Recordkeeping Requirements

### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

### 5.9.2 Records for HAP Emissions

The Permittee shall maintain records of HAP emissions on a calendar year basis for the emission units covered by Section 7

(Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7)(b) of the Act.

#### 5.9.3 Records for Other Source-Wide Emission Limitations

The Permittee shall maintain records of annual VOM emissions from the source-wide coating operations for purposes of verifying compliance with emission limits established in Condition 5.6.3. These records shall be calculated based on the procedures and equations established in Condition 7.1.12.

#### 5.9.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

### 5.10 General Reporting Requirements

#### 5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

#### 5.10.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information, including HAP emissions, for the previous calendar year.

### 5.11 General Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.



## 5.12 General Compliance Procedures

### 5.12.1 General Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be based on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 5.13 Special Permit Shield

N/A

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

### 6.1 Emissions Reduction Market System (ERMS)

#### 6.1.2 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

#### 6.1.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

#### 6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
  - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

#### 6.1.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

#### 6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

#### 6.1.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
  - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.1.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
  - i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
  - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
  - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
  - vi. If a source is operating a new or modified emission unit for which three years of operational data is not

yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 307 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 34.845 tons per season.
  - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.
  - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
  - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units  
  
Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
  - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
  - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

#### 6.1.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

#### 6.1.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
  - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
  - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
  - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.
- b. The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Natural Gas-fired boilers and ovens

## 7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

### 7.1 Coating Lines

#### 7.1.1 Description

The Permittee is a reconditioner of steel drums. After preliminary cleaning operation, coating operations are conducted by using paint spray booths and bake (curing) ovens.

#### 7.1.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description   | Date Constructed              | Emission Control Equipment |
|---------------|---|-------------------------------|----------------------------|
| Coating Lines | <u>Coating Line #1</u> (Interior Coating Line with Spray Booth SPB-1 and Steam Flash Oven FO-1) | April-August 1991 (All Lines) | Filter (AF-1)              |
|               | <u>Coating Line #2</u> (Primer Coating Line with Coating Booth SPB-2 and Curing Oven CO-1)      |                               | Filter (AF-2)              |
|               | <u>Coating Line #3</u> (Exterior Coating Line with Coating Booth SPB-3 and Curing Oven CO-2)    |                               | Filter (AF-3)              |
|               | <u>Coating Line #4</u> (Interior Coating Line with Spray Booth SPB-4 and Steam Flash Oven CO-1) |                               | Water Wall (WW-1)          |
|               | <u>Coating Line #5</u> (Exterior Coating Line with Coating Booth SPB-5 and Curing Oven CO-2)    |                               | Water Wall (WW-2)          |
|               | <u>Coating Line #6</u> (Exterior Coating Line with Coating Booth SPB-6 and Curing Oven CO-3)    |                               | Filter (AF-4)              |
|               | <u>Coating Line #7</u> (Ring Dip Coating Line with Dip Cater DC-1 and Curing Oven CO-2)         |                               | None                       |

#### 7.1.3 Applicable Provisions and Regulations

- a. An "affected coating line" for the purpose of these unit specific conditions is a coating operation that includes



spray coating booth (or dip coater) and curing/flash oven which is used to apply coatings to drums, lids, and rings.

- b. The exterior coating lines, primer coating line and ring dip coating line (Coating Lines 2, 3, 5, 6 and 7) at the source are subject to 35 IAC 218.204 (j) (2) (B) for Miscellaneous Metal Parts and Products Coating for extreme performance coating which provides that:

- i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products for extreme performance. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

| <u>kg/l</u> | <u>lb/gal</u> |
|-------------|---------------|
| 0.4         | 3.3           |

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

- c. The interior coating lines (coating lines #1 and 4) at the source are subject to 35 IAC 218.204 (j) (3) for Miscellaneous Metal Parts and Products Coating for steel pail and drum interior coating which provides that:

- i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products for steel pail and drum interior. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

| <u>kg/l</u> | <u>lb/gal</u> |
|-------------|---------------|
| 0.52        | 4.3           |

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

- d. The affected coating line is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- e. The affected coating line should comply with 40 CFR Part 63, Subpart M National Emission Standards for Hazardous Air Pollutants " Surface Coating of Miscellaneous Metal Parts and Products" when a compliance date January 2, 2007 become effective (See Condition 5.3.5(c) for more details).

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coating line is not subject to 35 IAC Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes affected coating line from this requirement.
- b. The affected coating line is not subject 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.
- c. The affected coating line is not subject 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.
- d. This permit is issued based on the each coating line operated at the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each line i) does not use an air pollution control device for controlling VOC and/or HAP emissions - the only major pollutants emitted by those lines - and ii) does not have pre-control PM<sub>10</sub> emissions exceeding major source threshold.

#### 7.1.5 Control Requirements and Work Practices

- a. The affected coating line bake oven shall only be operated with natural gas as the fuel.
- b. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.

- c. Compliance with 40 CFR 63.3893(b) shall be demonstrated if an add-on controls option is used.

7.1.6 Production and Emission Limitations

The VOM emissions from the source-wide coating operation, i.e., spray booths SPB-1 through SPB-6 and dip coater DC-1 shall not exceed the following limits:

| Pollutant | Emissions |          | Underlying Rules |
|-----------|-----------|----------|------------------|
|           | (ton/mo)  | (Ton/yr) |                  |
| VOM       | 12.0      | 97.7     | 35 IAC Part 203  |

The above limitations were established in Federally Enforceable State Operating Permit 90060034, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined based on the recordkeeping requirements established in this permit and from a running total of 12 months of data.

7.1.7 Testing Requirements

- a. Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7) (b) of the Act]:

Upon reasonable request by the Illinois EPA or USEPA, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).

- i. The VOM content of representative coatings as applied on the affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);
- ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent; and
- iii. The percent concentration of VOM in the manifested waste shall be determined according to USEPA Reference Method 24 of 40 CFR 60, Appendix A.

- b. For purpose of 40 CFR 63 Subpart M, the Permittee shall fulfill applicable testing requirements established in 40 CFR 63.3960 through 63.3967.

7.1.8 Monitoring Requirements

- a. Monitoring of the VOM content limit of Condition 7.1.3(b) and (c) may be achieved by either fulfilling requirements established in Condition 7.1.7 or by keeping appropriate records required in Condition 7.1.9.
- b. For purpose of 40 CFR 63 Subpart M, if add-on control device is used, the Permittee shall comply with 63.3968 for continuous parameter monitoring system.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each coating as applied on the affected coating line;
- b. The usage of each coating, in units of gallons/month and gallons/year;
- c. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each month on the affected coating line;
- d. Density of each applied coating and cleanup solvent, in units lb/gal;
- e. The usage of clean-up solvent, in units of gallons/month and gallons/year;
- f. The amount of manifested waste sent off site for reclamation or disposal, in units gallons/month and gallons/year;
- g. The average density in lb/gal and Wt.% (or lb/gal) of VOM/HAP in the manifested waste;
- h. Total VOM/HAP emissions in tons/month and tons/year from affected coating line calculated based on the recordkeeping requirements and compliance procedures from Condition 7.1.12;

- i. Records of the testing of VOM and HAP content of each coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:
  - A. Identification of material tested;
  - B. Results of analysis;
  - C. Documentation of analysis methodology; and
  - D. Person performing analysis.
- j. Maintenance log of control device(s) inspections and all necessary repairs being performed with dates of certain maintenance actions taken.
- k. For purpose of 40 CFR 63 Subpart Mmmm, the Permittee shall keep records in accordance with 63.3930 and 63.3931.

#### 7.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected coating line with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Conditions 7.1.3(b) and (c) (see also 35 IAC 218.204(j)(3)) within 30 days of such an occurrence.

- b. For purpose of 40 CFR 63 Subpart Mmmm, the Permittee shall submit applicable notifications and reports in accordance with 63.3910 and 63.3920.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating line without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings and clean-up solvents at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Conditions 5.6.1 and 5.6.3 are not exceeded and the affected coating line remains in compliance with Conditions 7.1.3 and 7.1.6.

#### 7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices used in operation of an affected coating line.
- b. Compliance of the affected coating line with VOM emission limitations in Condition 7.1.3(b) and (c) shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formula listed below:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D],$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \sum (w_i / d_i)$$

Where:

$w_i$  = Percent exempt compound i in the coating,

$d_i$  = Overall density of exempt compound i, lb/gal and the summation  $\sum$  is applied over water and all exempt compounds i in the coating.

- c. Compliance of the affected coating line with VOM emission limitations in Conditions 5.6.1, 5.6.3, and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the formula listed below (HAP emissions for the purposes of Annual Emission Report shall be calculated by using the same formula):

$$E_T = E_C + E_O$$

Where:

$E_T$  = Total VOM/HAP emissions, in pounds/month

$E_C$  = VOM/HAP emissions from all coatings, in pounds/month

$E_O$  = VOM/HAP emissions from all other VOM/HAP containing materials (e.g., cleaning solvents), in pounds/month.

## 7.2 Drum Reclamation Furnace

### 7.2.1 Description

The open head drums prior to their coating application are cleaned to remove residue in the drum reclamation furnace.

### 7.2.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Equipment                | Description   | Emission Control Equipment                       |
|---------------|--------------------------|---|--|
| Group 2       | Drum Reclamation Furnace | Natural Gas-Fired Drum Cleaning Reclamation Furnace DRF-1<br><br>Date of Construction: 1991; Modified in 2003 (Installation of PTE) | Permanent Total Enclosure and Afterburner (AB-1) |

### 7.2.3 Applicable Provisions and Regulations

- a. An "affected drum reclamation furnace" for the purpose of these unit specific conditions is a drum cleaning furnace as described in Conditions 7.2.1 and 7.2.2 above.
- b. The affected drum reclamation furnace is subject to the limits identified in Condition 5.3.2(b).
- c. The affected drum reclamation furnace is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- d. The affected drum reclamation furnace at the source is subject to 35 IAC 218.301 which requires that:

The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from an affected drum reclamation furnace. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.

- e. The affected drum reclamation furnace is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. CAM requirements are discussed further in Condition 7.2.8 and Attachment 2.

#### 7.2.4 Non-Applicability of Regulations of Concern

- a. The affected drum reclamation furnace is not subject 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected drum reclamation furnace is not by definition a fuel combustion emission unit.
- b. The affected drum reclamation furnace is not subject 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected drum reclamation furnace is not by definition a fuel combustion emission unit.
- c. The affected drum reclamation furnace is not subject 40 CFR Part 62 Subpart III "Federal Plan Requirements for commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or before November 30, 1999". This non-applicability is based on the exemption status for drum reclamation units established in 40 CFR 62.14525(k).

#### 7.2.5 Control Requirements and Work Practices

- a.
  - i. The secondary combustion chamber (afterburner) of the affected furnace shall be preheated to the manufacturer's recommended temperature but not lower than 1600°F prior to introducing drums into the furnace.
  - ii. This temperature shall be maintained until burnout of residue from the drums in the primary chamber is completed.
- b. No drums which were used to contain pesticides, fungicides, or insecticides shall be fed in the drum reclamation furnace.

#### 7.2.6 Production and Emission Limitations

- a. The operation of the drum reclamation furnace shall not exceed 3,000 hours/year.
- b. The total rate of drums being processed (drums fed) by the drum reclamation furnace shall not exceed the following limits:

| Drums Processed   |                   |
|-------------------|-------------------|
| <u>(Drums/hr)</u> | <u>(Drums/yr)</u> |
| 480               | 1,440,000         |



- c. Emissions of VOM and PM<sub>10</sub> from the affected drum reclamation furnace (process emissions) shall not exceed the following limits:

| VOM Emissions  |               | PM <sub>10</sub> Emissions |               |
|----------------|---------------|----------------------------|---------------|
| <u>(Lb/hr)</u> | <u>(T/yr)</u> | <u>(Lb/hr)</u>             | <u>(T/yr)</u> |
| 5.0            | 7.5           | 6.6                        | 9.9           |

The above limitations were established in Construction Permit 91040073, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- d. Compliance with annual limits shall be determined based on the recordkeeping requirements and from a running total of 12 months of data.

#### 7.2.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the VOM and PM<sub>10</sub> emissions from the affected drum reclamation furnace shall be determined according to USEPA Reference Methods 25 and 5 respectively of 40 CFR 60 Appendix A.

#### 7.2.8 Monitoring Requirements

- a. An afterburner of the affected drum reclamation furnace shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage.
- b. The condition of the affected drum reclamation furnace shall be inspected on a periodic basis for the presence of any deficiencies.

#### c. Compliance Assurance Monitoring (CAM) Requirements

The affected drum reclamation furnace is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information, as required by 40 CFR 64.9(b)(1).

#### 7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected drum reclamation furnace to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

- a. The afterburner combustion temperature during the time of operation;
- b. Number of drums charged into the furnace (drums/hr and drums/yr);
- c. Inspection maintenance logs for the drum reclamation furnace and afterburner, with all necessary repairs being performed with dates of certain maintenance actions taken;
- d. Operating hours of the drum reclamation furnace (hr/year); and
- e. The VOM and PM<sub>10</sub> emissions in tons/month and tons/year from affected drum reclamation furnace calculated based on the recordkeeping requirements and compliance procedures from Condition 7.2.12.

#### 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected drum reclamation furnace with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. The Illinois EPA shall be notified when:

- a. Operation of the afterburner combustion chamber with a temperature below 1600°F or below manufacturer=s recommended temperature.
- b. Exceedance of production and emission rates as established in Condition 7.2.6.
- c. Reporting of Compliance Assurance Monitoring (CAM)

The Permittee shall submit monitoring reports to the Illinois EPA in accordance with Condition 8.6.1 and shall include, at a minimum, the information required under Condition 8.6.1 and the following information [40 CFR 64.6(c)(3), 64.9(a)(1), and (2)]:

- i. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken [40 CFR 64.6(c)(3) and 64.9(a)(2)(i)]; and

- ii. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks [40 CFR 64.6(c)(3) and 64.9(a)(2)(ii)].

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected drum reclamation furnace. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

#### 7.2.12 Compliance Procedures

- a. Compliance with the particulate matter emission limitations in this section is assured and achieved by the work-practices inherent in operation of the affected furnace and emissions calculation based on the emission rate of 3.23 lb/hr demonstrated during stack testing conducted on December 13 and 14, 1991.
- b. Compliance with the VOM emission limitations in this section is assured and achieved by the work-practices inherent in operation of the affected furnace and emissions calculation based on the emission rate of 3.21 lb/hr demonstrated during stack testing conducted on December 13 and 14, 1991.
- c. Emission factors established in Conditions 7.2.12(a) and (b) are no longer applicable for determining compliance with emission limits of this permit if the Permittee exceeds operational and production limits established in Condition 7.2.6. New emission factors shall be created based on the retesting of the affected drum reclamation furnace, as required by Condition 7.2.7 of this permit.

### 7.3 Shot Blasters

#### 7.3.1 Description

After preliminary cleaning, the drums and lids are shotblasted to remove scale.

#### 7.3.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Equipment     | Description  | Emission Control Equipment          |
|---------------|---------------|--|-------------------------------------|
| Group 3       | Shot Blasters | Shot Blasters 1-4 (SB-1 Through SB-4) for Removing Scales<br><br>Dates of Construction:<br>#1-#3 - 1991<br>#4 - 1993 | Fabric Filter for Each Shot Blaster |

#### 7.3.3 Applicable Provisions and Regulations

- An "affected shot blaster" for the purpose of these unit specific conditions is a shot blasting operation that includes a shot blaster as described in Conditions 7.3.1 and 7.3.2 above.
- The affected shot blaster is subject to the limits identified in Conditions 5.3.2 (a) and (b).

#### 7.3.4 Non-Applicability of Regulations of Concern

- Each affected shot blaster is not subject to 35 IAC 212.321, "Particulate Matter Emissions from New Process Emission Sources", pursuant to 35 IAC 212.681.
- This permit is issued based on the each affected shot blaster operated at the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each shot blaster does not have pre-control PM<sub>10</sub> emissions exceeding major source threshold.

#### 7.3.5 Control Requirements and Work Practices

The Permittee shall operate and maintain the fabric filters, including periodic inspection, routine maintenance and prompt repairs of defects, if any, that assures compliance with conditions of this permit.

#### 7.3.6 Production and Emission Limitations

None

7.3.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the PM<sub>10</sub> emissions from the affected shot blasters shall be determined according to USEPA Reference 5 of 40 CFR 60 Appendix A.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected shot blasters. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected shot blasters to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Records addressing use of good operating practices for the fabric filters:
  - i. Records for periodic inspection of the fabric filters with date, name of individual performing the inspection, and nature of inspection; and
  - ii. Records of prompt repair of defects, with identification and description of defects, effect on emissions, date identified, date repaired, and nature of repair.
- b. Total PM<sub>10</sub> emissions in tons/month and tons/year from all affected shot blasters calculated based on the recordkeeping requirements and compliance procedures from Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected shot blasters with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected shot blasters. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

#### 7.3.12 Compliance Procedures

- a. Compliance with the opacity limitations in this permit (Condition 5.3.2(a) and (b)) is assured and achieved by the proper operation and maintenance of the fabric filters and the work-practices used in operation of affected shot blasters.
- b. To determine compliance with Condition 5.6.1, emissions from the affected shot blasters shall be calculated based on the following:

$$PM_{10} = (\text{Air Flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Fabric Filter Efficiency}^* (\%)/100]$$

- \* As specified by manufacturer or vendor of the fabric filter.

#### 7.4 Natural Gas-Fired Boiler

##### 7.4.1 Description

Natural gas-fired boiler is used to produce steam for production and heating needs at this source.

##### 7.4.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Equipment                      | Description  | Emission Control Equipment |
|---------------|--------------------------------|--|----------------------------|
| Group 4       | Natural Gas-Fired Boiler (B-1) | Maximum Heat Input Capacity: 12 mmBtu/hr<br><br>Date of Construction: 1991 | None                       |

##### 7.4.3 Applicable Provisions and Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions is a steam generating unit that is fired with natural gas, with maximum heat input capacity of 100 mmBtu/hr or less, but greater than or equal 10 mmBtu/hr, and constructed, modified or reconstructed after June 9, 1989. As a consequence, the affected boiler is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc.
- b. The emission of carbon monoxide (CO) into the atmosphere from the affected boiler with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

##### 7.4.4 Non-Applicability of Regulations of Concern

- a. The affected boiler is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of this boiler is less than 73.2 MW (250 mmBtu/hr).
- b. Pursuant to 35 IAC 218.303, any fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.
- c. This permit is issued based on the affected boiler operated at the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the boiler does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Control Requirements and Work Practices

Control requirements are not set for affected boiler. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be requirements for general source-wide control requirements set forth in Condition 5.5.

7.4.6 Production and Emission Limitations

Emissions and operation of affected boiler shall not exceed the following limits:

| Natural Gas Usage |            | NO <sub>x</sub> Emissions |        |
|-------------------|------------|---------------------------|--------|
| (mmscf/mo)        | (mmscf/yr) | (T/mo)                    | (T/yr) |
| 8.64              | 46.8       | 0.43                      | 2.34   |

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

The above limitations were established in Permit 95120079, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.4.7 Testing Requirements

Testing requirements are not set for the affected boiler. However, there are general testing requirements in Conditions 5.7 and 8.5.

7.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected boiler. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boiler to demonstrate compliance with Conditions 5.6.1 and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage, in terms of mmscf /month (or therms/month) and mmscf/year (or therms/year).
- b. Emissions of regulated air pollutants in tons/month and tons/year from the affected boiler calculated based on the



recordkeeping requirements and compliance procedures from Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected boiler with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boiler. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.4.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.6.1 and 7.4.6 of this permit shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

| <u>Pollutant</u> | Natural Gas  |
|------------------|--|
|                  | <u>Emission Factors</u><br><u>(lb/10<sup>6</sup> ft<sup>3</sup>)</u> |
| PM               | 7.6  |
| NO <sub>x</sub>  | 100  |
| SO <sub>2</sub>  | 0.6  |
| VOM              | 5.5  |

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March 1998.

Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

## 7.5 Plastic Drum Shredder

### 7.5.1 Description

The plastic drums with leaks are shredded in the plastic drum shredder. The exhaust from the drum shredder discharges through Cyclone Separator followed by a Baghouse.

### 7.5.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Equipment             | Description   | Emission Control Equipment                  |
|---------------|-----------------------|---|---|
| Group 5       | Plastic Drum Shredder | Shredding Plastic Drums<br><br>Dates of Construction:<br>1996 | Cyclone Separator<br>Followed by a Baghouse |

### 7.5.3 Applicable Provisions and Regulations

- a. An "affected plastic drum shredder" for the purpose of these unit specific conditions is a shredder of drums with leaks.
- b. The affected plastic drum shredder is subject to the limits identified in Conditions 5.3.2(a) and (b).
- c. The affected plastic drum shredder is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

### 7.5.4 Non-Applicability of Regulations of Concern

This permit is issued based on the each affected plastic drum shredder operated at the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the shredder does not have pre-control PM<sub>10</sub> emissions exceeding major source threshold.

### 7.5.5 Control Requirements and Work Practices

The Permittee shall operate and maintain the control devices, including periodic inspection, routine maintenance and prompt

repairs of defects, if any, that assures compliance with conditions of this permit.

7.5.6 Production and Emission Limitations

None

7.5.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the PM<sub>10</sub> emissions from the affected plastic drum shredder shall be determined according to USEPA Reference 5 of 40 CFR 60 Appendix A.

7.5.8 Monitoring Requirements

Monitoring requirements are not set for the affected plastic drum shredder. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected plastic drum shredder to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Records addressing use of good operating practices for air pollution control devices:
  - i. Records for periodic inspection of the control devices with date, name of individual performing the inspection, and nature of inspection; and
  - ii. Records of prompt repair of defects, with identification and description of defects, effect on emissions, date identified, date repaired, and nature of repair.
- b. Total PM<sub>10</sub> emissions in tons/month and tons/year from the affected plastic drum shredder calculated based on the recordkeeping requirements and compliance procedures from Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected plastic drum shredder with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

#### 7.5.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected plastic drum shredder. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

#### 7.5.12 Compliance Procedures

- a. Compliance with the opacity limitations in this permit (Condition 5.3.2(a) and (b)) is assured and achieved by the proper operation and maintenance of the air pollution control devices and the work-practices used in operation of the affected plastic drum shredder.
- b. To determine compliance with Condition 5.6.1, emissions from the affected plastic drum shredder shall be calculated based on the following:

$$PM_{10} = (\text{Air Flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Control Device Efficiency}^* (\%)/100]$$

- \* As specified by manufacturer or vendor of the control device(s).

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after March 23, 2005, unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

## 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of

such reports is required in Sections 5 or 7 of this permit [Section 39.5(7) (f) of the Act]:

| <u>Monitoring Period</u> | <u>Report Due Date</u> |
|--------------------------|------------------------|
| January - June           | September 1            |
| July - December          | March 1                |

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7) (a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7) (e) (i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency  
Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276



iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
1021 North Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

#### 9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

#### 9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

#### 9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under.

#### 9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

### 9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment),

practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

##### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

## 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254.

## 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

- iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

##### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5) (e) and (i) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7) (o) (v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7) (i) of the Act].

#### 9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5) (l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5) (h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal



application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

## 10.0 ATTACHMENTS

### Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- b. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- i. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A (P)^B$$

Where:

P = Process weight rate

E = Allowable emission rate

- ii. For process weight rates of 408 Mg/hr (450 T/hr):

|   | <u>Metric</u> | <u>English</u> |
|---|---------------|----------------|
| P | Mg/hr         | T/hr           |
| E | kg/hr         | lbs/hr         |
| A | 1.214         | 2.54           |
| B | 0.534         | 0.534          |

- iii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

|   | <u>Metric</u> | <u>English</u> |
|---|---------------|----------------|
| P | Mg/hr         | T/hr           |
| E | kg/hr         | lbs/hr         |
| A | 11.42         | 24.8           |
| B | 0.16          | 0.16           |

- c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

| Metric |       | English |       |
|--------|-------|---------|-------|
| P      | E     | P       | E     |
| Mg/hr  | kg/hr | T/hr    | lb/hr |
| 0.05   | 0.25  | 0.05    | 0.55  |
| 0.1    | 0.29  | 0.10    | 0.77  |
| 0.2    | 0.42  | 0.2     | 1.10  |
| 0.3    | 0.64  | 0.30    | 1.35  |
| 0.4    | 0.74  | 0.40    | 1.58  |
| 0.5    | 0.84  | 0.50    | 1.75  |
| 0.7    | 1.00  | 0.75    | 2.40  |
| 0.9    | 1.15  | 1.00    | 2.60  |
| 1.8    | 1.66  | 2.00    | 3.70  |
| 2.7    | 2.1   | 3.00    | 4.60  |
| 3.6    | 2.4   | 4.00    | 5.35  |
| 4.5    | 2.7   | 5.00    | 6.00  |
| 9.0    | 3.9   | 10.00   | 8.70  |
| 13.0   | 4.8   | 15.00   | 10.80 |
| 18.0   | 5.7   | 20.00   | 12.50 |
| 23.0   | 6.5   | 25.00   | 14.00 |
| 27.0   | 7.1   | 30.00   | 15.60 |
| 32.0   | 7.7   | 35.00   | 17.00 |
| 36.0   | 8.2   | 40.00   | 18.20 |
| 41.0   | 8.8   | 45.00   | 19.20 |
| 45.0   | 9.3   | 50.00   | 20.50 |
| 90.0   | 13.4  | 100.00  | 29.50 |
| 140.0  | 17.0  | 150.00  | 37.00 |
| 180.0  | 19.4  | 200.00  | 43.00 |
| 230.0  | 22.0  | 250.00  | 48.50 |
| 270.0  | 24.0  | 300.00  | 53.00 |
| 320.0  | 26.0  | 350.00  | 58.00 |
| 360.0  | 28.0  | 400.00  | 62.00 |
| 408.0  | 30.1  | 450.00  | 66.00 |
| 454.0  | 30.4  | 500.00  | 67.00 |

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

Table 3.1 - PSEU Designation:

Significant Emission Unit  
Section:

Pollutant:

Drum Reclamation Furnace (DRF)

7.2

VOM, PM

Indicators:

#1: Afterburner Chamber  
Temperature

#2: Physical  
Conditions of  
DRF

GENERAL CRITERIA

THE MONITORING APPROACH USED TO  
MEASURE THE INDICATORS:

THE INDICATOR RANGE WHICH  
PROVIDES A REASONABLE ASSURANCE  
OF COMPLIANCE:

QUALITY IMPROVEMENT PLAN (QIP)  
THRESHOLD LEVELS:

|  |  |
|--|--|
| Continuous temperature<br>monitoring   | Periodic<br>inspections of<br>DRF  |
| Maintain a minimum of<br>1600°F when introducing<br>drums to the DRF                                       | Maintain<br>operation and<br>proper function<br>of all controls  |
| Threshold is the<br>excursion or exceedance<br>of during more than 5<br>percent of total<br>operating time | Threshold is<br>the failure to<br>achieve proper<br>operation more<br>than 5 percent<br>of total<br>operating time |

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING  
REPRESENTATIVE DATA:

VERIFICATION PROCEDURES TO  
CONFIRM THE OPERATIONAL STATUS OF  
THE MONITORING:

QUALITY ASSURANCE AND QUALITY  
CONTROL (QA/QC) PRACTICES THAT  
ENSURE THE VALIDITY OF THE DATA:

THE MONITORING FREQUENCY:

THE DATA COLLECTION PROCEDURES  
THAT WILL BE USED:

THE DATA AVERAGING PERIOD FOR  
DETERMINING WHETHER AN EXCURSION  
OR EXCEEDANCE HAS OCCURRED:

|   |                                   |
|---|-----------------------------------|
| A thermocouple  | Periodic<br>inspection<br>reports |
| Operation and response<br>of chart recorder           | Review of<br>periodic<br>records  |
| Verification of<br>connection and signal<br>integrity | Review of<br>periodic<br>records  |
| Continuous during<br>operation                        | Periodic                          |
| Chart recorder  | Inspection<br>records             |
| Continuous/daily                                      | N/A                               |

#### Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, [www.epa.state.il.us](http://www.epa.state.il.us). This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

##### Guidance On Revising A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-revising.pdf](http://www.epa.state.il.us/air/caapp/caapp-revising.pdf)

##### Guidance On Renewing A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-renewing.pdf](http://www.epa.state.il.us/air/caapp/caapp-renewing.pdf)

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

[www.epa.state.il.us/air/caapp/index.html](http://www.epa.state.il.us/air/caapp/index.html)

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)

AB:psj